

DIVORCE DECREE

THE STATE OF ALABAMA, BALDWIN COUNTY CIRCUIT COURT, IN EQUITY

LEAT	HA ERMINE ALLEN	, Complainant
	vs.	
LONN	IE ALLEN	, Respondent
This cause coming or	n to be heard was submitted upon Bil	l of Complaint, Decree Pro/Confesso A
Answer and Waiver		noted by the Register, and upon co
ideration thereof, the Court is aid bill.	s of the opinion that the Complainan	t is entitled to the relief prayed for
and produced the second second		are hereby, dissolved, and that the sa
LEATHA ERMINE ALLEN		is forever divorced from t
aid LONVIE ALLEN	**************************************	for and on account
Cruelty,		·
Leatha Ermine Allen	ordered, adjudged and decree, shall have the care, custory Allen and Paul Allen.	ed that the said Complainant, ody and control of the two
Lonnie Allen, shall	pay to the said Complainam	
Paul Allen.	and support for said minor	
	ordered, adjudged and dscree hts of visitation of said m	ed that the Respondent shall inor children during their
dependence.		
It is further ordered that gain contract marriage upon to the It is further ordered that the Respondent	marry except to each other during to the Complainant and Respondent being payment of the cost of this suit. It Lonnie Allen pay the cost herein to be as of	taxed, for which execution may issue.
managa mengang pantungan sebagai		Judge Circuit Court, In Equity
Ι,	Court of Baldwin County, a going is a correct copy of the Circuit Court in the is on file and enrolled in my	seal this theda
	n	Register of Circuit Court, In Equit
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No3343	
THE STATE OF ALABA Baldwin County	MA
IN EQUITY Circuit Court of Baldwin Co	ounty
LEATHA ERMINE ALLEN	
vs.	
LCNNIE ALIEN	
NOTE OF TESTIMONY	
Filed in Open Court this	
day of	194
Printed By The Baldwin Tin	

No. 3342	No	3	3	4	2
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THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

LEATHA ERITINE ALLEN

Complainant

VS.

LONNIE ALLEN

Respondent

DIVORCE DECREE

FILED SEP 2 1954

ALICE J. DUCK, Register

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THE STATE OF ALABAMA Baldwin County

Circuit Court

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KNOW YE: That we,	having full faith in	TOUT NEURONA	and compoton	ar harra annointad
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you Commissioner, and by	_		-	
point, to call before you and	examine <u>Leatha</u>	<u> Ermine illen a</u>	ind Mrs. Sus	ie Mae Chalin
W				
White the state of	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	W-1444		
as witnesses in behalf of I	eatha Ermine Alle	12	in a ca	use pending in our
Circuit Court in Baldwin Co	ounty, of said State, v	wherein		
<u> </u>	eatha Ermine Alle	n		.,
at				
H				
				, Complainant
and				
	Lonnie Allen			
				-
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on oath, to be by you admini	stered, upon			
to take and certify the depo	sition <u>s</u> of the witne	ss_es and return	the same to	our Court, with all
convenient speed, under you	ur hand.		and the second s	
Witness 2 mg day	- e & & & & & & & & & & & & & & & & & &	Z	1045 7/	
writiness day	/ 01	1		Register.
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ORAL DEPOSITION			Printed by Moor	e Printing Co.
The State of Alabama, Baldwin County.	Circuit Court	of Baldwi (In Equ	n County, Alaba ity)	ma
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IEATHA ERMINE	CALLEN		_ Complainant	
tilegam îs gameen jaar begine arit in eg LONNIE ALIEN	ys		Respondent	e sistema (b.)
I, Lyrleene Mixon				
as Registeroscial Commissioner				
have called and caused to come before me	Leatha Ermine	Allen and	Mrs. Susie Mae	Chafin
witness enamed in the Requirement for Or	N/N au	n the_2nd_	day of <u>September</u>	
in Bay Minette , Als				-
truth, the whole truth, and nothing but the	truth, the said -	Leauna s	amine Allenand	MTT. D 4
Susie Mae Chafin doth depos	se and say as follo	ws:		

That my name is Leatha Ermine Allen, I am over the age of 21 years and a resident of Baldwin County, Alabama, and have been all of my life. The Respondent is over the age of 21 years and is presently residing at 206 Meeks Court, Findley, Ohio. We were married in Bay Minette, Alabama on Section 23, 2003 and 25 September 13, 1933 and lived together as husband and wife until on or about August 1, 1953, that on or about 1st of August, 1953, the Respondent assaulted and beat me striking me about the head and body, allof which accurred without any fault on my part and because of his threats and having beat me I became in fear of my life and health and afraid to live with him any more as his wife. There was born as fruits of this marriage between the complaainant and the Respondent two children, Jerry Allen age about 13 years and Paul Allen, age 11 years. I respectfully represent unto this Honorable Court that I have had the care, custody and control of these children since birth and that I am a fit, suitable and proper person to have the permanent care, custody and control of these children, and I respectfully ask that I be granted the care, custody and control of these children. The respondent is a person of considerable means making a good income and well able to maintain and support said children in my care, custody and control. I respect fully represent that while \$30.00 a week is a reasonable sum that I have by way of comprom se agreed with the Respondent to accept \$20.00 a week as maintenance and support for said children only under present conditions. I respectfully ask that I be granted a divorce with maintenance presently in the amount of \$20.00 per week for said children, I ask nothing for myself.

Leatha Erm

That my name is Susie Mae Chafin, I know both parties to this cause they are both over the age of 21 years and the Complainant is a resident of Baldwin County, Alabama, and has been more than two years next preceding year. The parties to this cause were married about September 13, 1933, and lived together as husband and wife in Alabama, but was separated on or about August 1, 1953, the cause of the separation was the treatment by the Respondent of the Complainant, which being so cruel it placed her in fear of her life and health so she was afraid to live with him as his wife any longer. There were born as fruits of this marriage two children, Jerry Allen, age about 13 years and Paul Allen, age about 11 years, these children have been in the care, custody and control of the Complainant, their mother, since birth, and I respectfully represent unto this Honorable Court that the said complainant is a fit, suitable and proper person to have the care, custody and control of these children.

Mrs Dusie Mas O Raden

I, Lyrleene Mixon	-, as Register and Commissioner hereby certify
that the foregoing deposition_S_on Oral Examination was	taken down by me in writing in the words
of the witness es and read over to them and they	signed the same in the presence of myself
and C. Le Noir Thompson	
at the time and place herein mentioned; that I have person	nal knowledge of personal identity of said wit-
ness_@S_ or had proom made before me of the identity of	· · · · · · · · · · · · · · · · · · ·
kin to any of the parties to said cause, or any manner int	
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I enclose the said Oral Examination in an envelope	to the Register of said Court.
Given under my hand and seal, this 2ndd	ay of <u>Sentember</u> , 19.54-
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STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LONNIE ALLEN to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in the Corcuit Court of Baldwin County, Alabama, in equity, by LEATHA ERWINE ALLEN, as Complainant and against LONNIE ALLEN, Respondent.

WITNESS my hand this _____ day of September, 1954.

Register.

LEATHA ERMINE ALLEN

COMPLAINANT

VS

LONNIE ALLEN

RESPONDENT

IN THE CIRCUIT COURT OF
BALDVIN COUNTY, ALABAMA
IN EQUITY.

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Your Complainant, Leatha Ermine Allen, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both over the age of 21 years, that your Complainant is a bona fide resident of Baldwin County, Alabama, and the Respondent is presently residing 206 Meeks Court, Findley, Chio.

2.

That your Complainant and the Respondent married in Bay Minette, Alabama, on September 13, 1933, and lived together as husband and wife until the 1st day of August, 1953.

3.

That your Complainant avers and alleges that since their marriage that said Respondent has been guilty of adultery with divers parties and persons whose names to your Complainant are unknown, which actions of the Respondent have not been condoned by your Complainant.

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Complainant avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this bill of complaint, since which time Complainant and Respondent have

not lived together nor in any way recognized each other as husband and wife.

5.

Your Complainant avers and charges that the said Respondent did on or about the 1st day of August, 1953, and many times subsequent prior thereto assault, beat, hit and strike complainant; that said Respondent has committed actual violence on her person attended with langer to her health or life; Complainant avers and charges that Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

6.

There was born as fruits of this marriage between the Complainant and the Respondent two children; Jerry Allen, age thirteen, Paul Allen, age eleven. That the mother of said children is a suitable, fit and proper person to have the care, custody and control.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said LONNIE ALLEN, Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

That your Complainant be awarded the care, custody and control of the minor children, Jerry Allen, age thirteen, Paul Allen, age eleven; that your Honor will grant to the Complainant permanent maintenance for said children in the amount of Thirty (\$30.00) Dollars per week and inasmuch as your Complainant is without funds it is suggested that One Hundred (\$100.00) Dollars be allowed as a reasonable Solicitor's fee to your Complainant's Solicitor for his services herein, and that upon a final hearing of this cause, that your Honor will render a decree granting to your Complainant permanent alimony for the support and maintenance of said minor children, and your Complainant prays for such other, further or general relief to which she may be entitled, and your Complainant prays, etc.

FILED 9-2-5-4 MICE L MILK, Register

Solicitor for Complainant.

IN THE CIRCUIT COURT OF BALDAIN COUNTY, ALABAMA IN EQUITY

LEATHA ERMINE AILEN,

COMPLAINANT,

LONNIE ALLEN,

RESPONDENT.

Bill of Complaint

G. LeNoir Thompson Attorney At Law Bay Minette, Alabama

GEP 2 1954

LWATHA ERMINE ALLEN,

COMPLAINANT,

BALDWIN COUNTY, ALABAMA

VS

IN EQUITY.

LONNIE ALLEN,

BESPONDENT.

Now comes the Respondent and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages and marriage, residence, and agreement entered into between the parties to support the minor children during their years of dependency, but denies all other allegations contained in the bill of complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without notice.

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STATE OF AHID.

13. X

I, <u>DWIGHT L. MURRAY</u>, a Notary Public, in and for said County, in said State, hereby certify that Lonnie Allen, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 275day of August, 1954.

Notary Tublic,

DWIGHT C. MURRAY NOTARY PUBLIC, STATE OF OHIC My Commission Expires Sept. 18, 1956

FILED 9.2.54

AUSE 1. DUCK, Register

LEATHA ERMINE ALLEN

COMPLAINANT

VS

LONNIE AILEN

RESPONDENT

ANSWER AND WAIVER

FILED
SEP 2 1954
ALIGE J. DUCK, Rogister

From the law offices of C. LeNoir Thompson Bay Minette, Alabama

We, the undersigned parties to the cause of LEATHA ERMINE ALLEN vs LONNIE ALLEN, redizing that we can never live together again as husband and wife, and are now in the process of obtaining a divorce, have entered into the following agreement concerning Jerry Allen and Paul Allen fruits of their marriage:

That the said Leatha Ermine Allen is considered by both parties to be a fit, suitable and proper person to have the care, custody and control of the said children, ages thirteen and eleven. That the said Lonnie Allen, shall have the full rights of visitation with the said child, at reasonable and convenient times. That the said Leatha Ermine Allen, does not ask for alimony for herself. That the said Lonnie Allen agrees that he shall provide a reasonable sum for the support and maintenance of the said children, Jerry Allen and Paul Allen, which sum is presently agreed to be Twenty and no/100 Dollars (\$20.00) per week, under existing conditions.

In Witness Whereof, we have hereunto set our hands and seals, this 10th day of August, 1954.

Leatha, Ermine allen (L.S.)

STATE OF OHIO SS: COUNTY OF HANCOCK

A-2100 34

Before me the undersigned authority personally appeared Lonnie Allen, who is known to me, and who being informed of the contents of the foregoing agreement, voluntarily executed same, the day same bears date.

STATE OF ALABAMA SS:

My Commission Status Sept. 18, 1996 BALDWIN COUNTY

Before me the undersigned authority personally appeared Leatha Ermine Allen, who is known to me, and who being informed of the contents of the foregoing agreement, voluntarily executed same, the day same bears date.

ALICE J. DECK. Registes

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ERMINE ALLEN

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AUCE L DUCK, Register

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STATE OF ALABAMA BALDWIN COUNTY

BE IT HEREBY AND HEREINAFTER, agreed between the parties to this instrument that on September 2, 1954, the said LEATHA ERMINE ALLEN obtained a divorce from LONNIE ALLEN in which decree the custody of the following named children was granted to the said LEATHA ERMINE ALLEN:

Jerry Allen and Paul Allen.

And by these presents the said Leatha Ermine Allen does release from the decree of the court the responsibility set out in said decree for the payment of support and maintenance of the several children.

The said Leatha Ermine Allen does not by this instrument waive her right to custody but does expressly waive further support for the two children and shall hereafter claim them as her dependents.

To all of which the said Lonnie Allen, respondent in the above cause does agree and ratify.

Leatha Ermine Allen.

Long allen

Before me the undersigned authority personally appeared Leatha Ermine Allen and Lonnie Allen, who are known to me and who being informed of the contents of the foregoing agreement voluntarily executed same on this the day of February, 1957.

Notary Public, Baldwin County, Alabama.

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